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10 Attorneys for Defendant
11 Twitter, Inc.

12 UNITED STATES DISTRICT COURT
13
14 NORTHERN DISTRICT OF CALIFORNIA
15
16 SAN FRANCISCO DIVISION

16 JOHN DOE #1 AND JOHN DOE #2,
17
18 Plaintiff,
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20 v.
19 TWITTER, INC.,
20
21 Defendant.

Case No. 3:21-cv-00485-JCS

**DECLARATION OF LINH K. NGUYEN IN
SUPPORT OF STIPULATION AND
[PROPOSED] ORDER ON DEFENDANT
TWITTER INC.'S ANSWER TO THE FIRST
AMENDED COMPLAINT**

Judge: Hon. Joseph C. Spero
Trial Date: Not yet set

1 I, Linh K. Nguyen, declare as follows:

2 1. I am an attorney licensed to practice law in California and am an associate at Cooley,
3 LLP and counsel of record for Defendant Twitter, Inc. (“Twitter”) in this matter. I make this
4 declaration based on my personal knowledge of this matter and information I obtained following a
5 reasonable investigation of the events described below. If called as a witness, I could and would
6 testify competently to the matters stated herein.

7 2. I submit this declaration pursuant to Civil Local Rule 6-2(a) and in support of the
8 Parties’ Stipulation and Proposed Order re Defendant’s Answer to the First Amended Complaint
9 (“FAC”).

10 3. Plaintiffs filed a Complaint in the above-entitled action in U.S. District Court for the
11 Northern District of California on January 20, 2021;

12 4. On February 10, 2021, the Parties sought, and the court granted, an extension for
13 Twitter to respond to the Complaint and to extend the Initial Case Management Conference;

14 5. Plaintiffs filed the FAC on April 7, 2021;

15 6. On April 13, 2021, the Parties sought, and the court granted, a stipulated briefing
16 schedule for Twitter’s motion to dismiss the FAC and to extend the Initial Case Management
17 Conference;

18 7. Twitter’s deadline to answer the FAC is September 2, 2021;

19 8. Counsel for Twitter has previously scheduled vacation during Twitter’s response
20 time;

21 9. The FAC contains 235 paragraphs of detailed factual allegations and is 55 pages
22 long;

23 10. A further Case Management Conference in this matter is currently set for November
24 5, 2021;

25 11. This modification would not affect the case schedule as none has been entered.

26 12. This modification will not affect any hearing or proceeding on the Court’s calendar;

27 13. The Parties agree that a two-week extension of Twitter’s deadline to answer the
28 FAC is reasonable given the foregoing.

1 I declare under penalty of perjury that the foregoing is true and correct. This declaration
2 was executed on August 31, 2021 in San Diego, California.

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4 Dated: August 31, 2021

5 /s/ Linh Nguyen

6 Linh K. Nguyen
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